

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

CHARLESTON DIVISION

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE
ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS DEFENDANT
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits and defendant American Medical Systems, Inc. ("AMS") advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions with prejudice, and terminate AMS from the docket in the actions. Other defendants remain in these actions, and plaintiffs will continue to prosecute these actions against them.

Respectfully:

/s/ Barbara R. Binis

Barbara R. Binis

Stephen J. McConnell

Tracy G. Weiss

REED SMITH

Three Logan Square, Suite 3100

1717 Arch Street

Philadelphia, PA 19103

215.851.8100 (phone)

215.851.1420 (fax)

bbinis@reedsmith.com

Attorney for Defendant American Medical Systems, Inc.

/s/ Aimee H. Wagstaff
Aimee H. Wagstaff
ANDRUS WAGSTAFF
7171 West Alaska Drive
Lakewood, CO 80226
303.376.6360 (phone)
303.376.6361 (fax)
Aimee.Wagstaff@ahw-law.com
Attorney for Plaintiffs on Exhibit A

/s/ William J. Doyle II
William J. Doyle, II
DOYLE LOWTHER
Suite 150
10200 Willow Creek Road
San Diego, CA 92131
858.935.9960 (phone)
858.939.1939 (fax)
bill@doylelowther.com
Attorney for Plaintiffs on Exhibit B

Dated: January 9, 2015